

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

JOYCE GOODWIN,

Plaintiff,

V.

**NCO FINANCIAL SYSTEMS, INC.; and
DOE 1-5**

Defendants.

Civil Action No.

COMPLAINT
(Jury Trial Demanded)

1. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq. (“FDCPA”).

JURISDICTION AND VENUE

2. This Court exercises jurisdiction under 15 U.S.C. 1692k and 28 U.S.C. 1331. This District is of proper venue as Plaintiff is a resident within this District and Defendants engaged in the activities herein alleged against Plaintiff while Plaintiff so resided.

PARTIES

3. Plaintiff, JOYCE GOODWIN (hereinafter “Plaintiff” or “Ms. Goodwin”), is a natural person residing in Germantown, TN. Defendant, NCO FINANCIAL SYSTEMS, INC. is a corporation believed to maintain its principle place of business at 507 Prudential Rd. in Horsham, Pennsylvania.

4. Plaintiff is ignorant of the true names and capacities of the defendants sued herein as DOE 1-5, and therefore sues these defendants by such fictitious names. Plaintiff will amend this Complaint to allege the true names and capacities once ascertained. Plaintiff believes and thereon alleges that the fictitiously named defendants are responsible in some manner for the occurrences herein alleged, and that such defendants are responsible to Plaintiff for damages and/or monies owed.

5. NCO FINANCIAL SYSTEMS, INC. and DOE 1-5 shall jointly be referred to as “Defendants” herein.

6. Defendants regularly operate as third-party debt collectors and are “debt collectors” as defined by 15 U.S.C. 1692a(6).

FACTUAL ALLEGATIONS

7. Defendants engaged in an attempt to collect a consumer debt allegedly owed by Ms. Goodwin.

8. Defendants began calling Ms. Goodwin in November of 2013 and continued to call approximately twice daily through February 23, 2014. Defendants called Ms. Goodwin from multiple numbers, making it difficult for her to screen the calls.

9. Between February 24 and March 12, 2014, Defendants calls increased to an average of almost six calls per day. Defendants called Ms. Goodwin no less than 93-times between February 24 and March 12, 2014 alone and continued to call through August 2014.

10. Ms. Goodwin, increasingly harassed by Defendants' repeated calls, obtained counsel with Centennial Law Offices.

11. As a direct result of the collection activity herein alleged, Ms. Goodwin has incurred legal fees of \$2,155.00.

COUNT I

12. Plaintiff re-alleges paragraphs 1 through 11, inclusive, and by this reference incorporate the same as though fully set forth herein. Plaintiff is informed and believes and herein alleges that Defendants violated 15 U.S.C. 1692d by engaging in conduct the natural consequence of which was to harass, oppress, or abuse Plaintiff in connection with the collection of a debt.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment against Defendants, and each of them, recovery for each cause of action in the alternative, as follows:

- 1.) For statutory damages in the amount of \$1,000 pursuant to 15 U.S.C. 1692k(2);
- 2.) For \$2,155.00 in legal fees incurred in responding to unlawful collection activity;
- 3.) For prejudgment interest in an amount to be proved at time of trial;
- 4.) For attorney's fees pursuant to 15 U.S.C. 1692(k);
- 5.) For the costs of this lawsuit; and

6.) For any other and further relief that the court considers proper.

JURY DEMAND

Plaintiff demands a jury trial.

Date: December 30, 2014

s/Robert Amador
Robert Amador, Esq.
Attorney for Plaintiff Joyce Goodwin
Centennial Law Offices
9452 Telephone Rd. 156
Ventura, CA. 93004
(888)308-1119 ext. 11
(888) 535-8267 fax
R.Amador@centenniallawoffices.com